

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

**THE CITY OF PRAGUE,
OKLAHOMA et al.,**

Plaintiffs,

v.

**CAH ACQUISITION COMPANY 7,
LLC, et al.,**

Defendants.

Case No. CIV-19-89-G

**RECEIVER’S AND PLAINTIFFS’ JOINT RESPONSE TO SHOW CAUSE
ORDER AND SUGGESTION REGARDING WIND UP OF RECEIVERSHIP**

Cohesive Healthcare Management and Consulting (“Cohesive”), the duly appointed Receiver in this case, and Plaintiffs, the City of Prague, Oklahoma, and Prague Public Works Authority (“Prague” or “Plaintiffs”), submit this response to the Court’s Order to Show Cause entered June 6, 2019 [Dkt. No. 74].

Cohesive believes that the receivership in this case may be terminated because operation of the Prague hospital is being conducted through the Chapter 11 bankruptcy case of CAH 7 in the United States Bankruptcy Court for the Eastern District of North Carolina, Case No. 19-01298-5-JNC (the “N.C. Bankruptcy”). The Trustee in the N.C. Bankruptcy has hired Cohesive and operation of the Prague hospital is proceeding under agreements which have been approved by the Court in the N.C. Bankruptcy.

Based on the filings made by Plaintiffs in this case, it appears that the only remaining issue will be assertion of contempt claims by Plaintiffs. The Receiver does not believe that

continuation of the receivership is necessary for those matters. As a matter of convenience, Cohesive requests that the Court set a date certain for termination of the receivership on a month end so that final reporting will coincide with normal financial reporting, and also set a deadline of approximately thirty days after termination for Receiver's final report.

Receiver has communicated with Plaintiffs and is authorized to state that Plaintiffs are in agreement with the proposed termination of the Receivership in this case.

s/ Charles Greenough

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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2019, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all registrants

s/ Charles Greenough

Charles Greenough